

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION**

**SHAWN SMITH**

**PLAINTIFF**

**v.**

**CIVIL ACTION NO. 1:20-cv-00345-HSO-JCG**

**POWER DYNAMICS INNOVATIONS, LLC**

**DEFENDANT**

**JOINT MOTION FOR A CONSENT PROTECTIVE ORDER**

COME NOW Defendant Power Dynamics Innovation, LLC (“Power Dynamics” or “Defendant”), and Plaintiff Shawn Smith (“Plaintiff” or “Smith”) (collectively “the Parties”), by and through their counsel of record, and move this Court, under Federal Rule of Civil Procedure 26(c), for entry of the Consent Protective Order establishing procedures for the protection of confidential documents and information and, in support thereof, state as follows:

1. The parties began discovery in this matter and determined that such discovery will require the disclosure of confidential materials which are entitled to protection from public disclosure.

2. In particular, the parties anticipate the disclosure of confidential materials, including information about current or former employees, and information about current or former projects of Defendant, and proprietary information of Defendant, as well as confidential and personal financial and medical information of the Plaintiff.

3. In order to facilitate the prompt production of discovery materials and resolution of disputes over confidentiality, adequately protect material entitled to be kept confidential, and ensure that protection is afforded only to material so entitled; the parties have conferred and agree upon the procedures set forth in the Consent Protective Order submitted to the Court.

4. This Court has the authority to enter the attached Consent Protective Order pursuant to Federal Rule of Civil Procedure 26(c)(1).

5. Due to the nature of this Motion, the parties request that they be relieved of the requirement to submit a supporting memorandum pursuant to L.U.Civ.R. 7(b)(4).

WHEREFORE, Defendant and Plaintiff request that the Court enter the Consent Protective Order submitted hereto and that this Court grant such other further and different relief as this Court deems fair and just.

Respectfully submitted, this the 24<sup>th</sup> day of August, 2021.

**POWER DYNAMICS INNOVATIONS, LLC,**  
Defendant

BY: /s/ Robin Banck Taylor  
ROBIN BANCK TAYLOR (MSB NO. 100195)

ATTORNEY FOR DEFENDANT

OF COUNSEL:

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**CERTIFICATE OF SERVICE**

I, Robin Banck Taylor, hereby certify that on this date, I electronically filed the above and foregoing with the Clerk of the Court using the ECF system which sent notification of such filing to the following:

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**ATTORNEYS FOR PLAINTIFF**

This the 24<sup>th</sup> day of August, 2021.

/s/ Robin Banck Taylor  
ROBIN BANCK TAYLOR

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